



May 5, 2003

To Whom It May Concern:

I'm writing this letter representing RainSweet's opinion on the Current proposed USDA standard for Frozen Diced Onions, Release # 029-03

RainSweet is not in agreement with the proposed standard for several reasons.

- The defect levels proposed are anywhere from 35 to 40 times normal acceptable limits processors currently use. This includes Decay, which could be bacteriological, fungal, insect damage or viral decay.
- The Color standard is inadequate and too broad.
- This standard does not address food safety in any way. Onions are a unique vegetable and do not require a heat step to prevent enzymatic degradation. However we feel that this heat step is important since the primary use of this product is as an ingredient, so a heat step to reduce pathogenic bacteria is important in most cases.

We are in agreement with the northwest processors that this standard, if enacted, will seriously degrade diced onions as a commodity. It will promote a flood of product that is not properly processed to ensure that it is a "Food Safe" ingredient.

Sincerely,

Mike Harcourt
Vice President of Operations, RainSweet Inc.